

AO 94 (REV.5/85) Criminal Complaint

AUSA MANISH S. SHAH, (312) 353-0517

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UNITED STATES DISTRICT COURT

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APR 05 2002

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

APR - 5 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

v.

MAGISTRATE JUDGE ARLANDER KEYS
UNITED STATES DISTRICT COURT

CRIMINAL COMPLAINT

MICHAEL RENAUD

DOCKETED

CASE NUMBER

02CR0328

(Name and Address of Defendant)

APR 09 2002

MAGISTRATE JUDGE KEYS

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 18, 2001, continuing until on or about April 5, 2002, in Cook County, in the Northern District of Illinois defendant(s) did,

(Track Statutory Language of Offense)

use a means of interstate commerce knowingly to attempt to persuade, induce, entice and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which defendant can be charged with a criminal offense

in violation of Title 18 United States Code, Section(s) 2422(b).

I further state that I am a(n) United States Postal Inspector and that this complaint is based on the following facts:

Official Title

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant

Sworn to before me and subscribed in my presence,

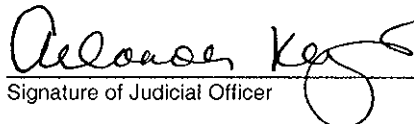
April 5, 2002

Date

at Chicago, Illinois

City and State

U.S. Magistrate Judge Arlander Keys
Name & Title of Judicial Officer



Signature of Judicial Officer

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS

AFFIDAVIT

I, Robert A. Williams, being duly sworn, do hereby depose and state:

1. I am a United States Postal Inspector and have been so employed since July 1984. I am currently assigned to the Northern Illinois Division of the Postal Inspection Service.
2. The information contained within this affidavit is based on my personal observations and training, as well as on information related to me by other law enforcement officers. This affidavit does not, however, contain everything I know about this investigation or all the information obtained during the course of this investigation.
3. This affidavit is made in support of a complaint charging Michael Renaud, also known by the screen names as "a_hotmike82," "Michael," "mrenaud1" and "wemr4664," with violating Title 18, United States Code, Section 2422(b), which states:

Whoever, using the mail or any facility or means of ... foreign commerce ... knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in ... any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title, imprisoned not more than 15 years, or both.
4. The following terms have the indicated meaning in this affidavit:
 - a. The term "sexual act" as used herein is defined as set forth in 18 U.S.C. § 2246(2).

- b. The term "computer" as used herein is defined as set forth in 18 U.S.C. § 1030(e)(1).
5. Since February 1992, I have been assigned to the Federal Child Exploitation Strike Force, a multi-jurisdictional, undercover, proactive unit comprised of the Postal Inspection Service, Detectives from the Cook County Sheriff's Police Department Child Exploitation Unit (CEU), Youth Officers from the Chicago Police Department, and Investigators from the Cook County State's Attorney's Office. The purpose of the Strike Force is to identify and investigate the activities of persons suspected of sexually exploiting or sexually abusing children, oftentimes by the use of e-mail and the Internet.
6. I have received training in the investigation of child pornography and child sexual exploitation at several schools and seminars. As part of my work, I have conducted over 320 child sexual abuse or child sexual exploitation investigations. Many of these investigations involved persons suspected of distributing and receiving child pornography.
7. In addition to my experience, I have received extensive training in the investigation of computer-related child sexual exploitation crimes. I have personal knowledge in the operation of a computer. Based on this training and knowledge, I know the following:
 - a. The Internet is a worldwide computer network that connects computers and allows communications and the transfer of data and information across state and national boundaries. The Internet itself is broken down into three major parts: The

World Wide Web (www), Usenet Newsgroups, and the Internet Relay Chat (IRC).

- b. Individuals who use the Internet can communicate with each other by using electronic mail, also known and referred to herein as "e-mail," or by using instantaneous private messaging communications. E-mail is an electronic form of communication that can contain letter-type correspondence and graphic images. E-mail is similar to conventional paper-type mail in that it is addressed from one individual to another.
- c. An e-mail message usually contains a "header" that provides the sender's screen name, the identity of the Internet access provider, and the return address on the Internet of the individual who originated the message or graphic.
- d. Yahoo! Messenger is a free network service that uses the connection that is established with the Internet Service Provider (ISP). The Yahoo! Messenger software is downloaded and the user creates an account and personal screen name. This account and the screen name are the same and allow the user access to the entire Yahoo network.
- e. Yahoo! Messenger allows users to communicate and transfer files. Communications can occur privately, between users or among a group. Communications between users occurs via instant messaging ("im") or using the webcam feature which allows a user to view another in real time utilizing a small camera attached to the user's computer. Even though a user is offline, messages sent to a user can still be retrieved.
- f. A Yahoo! Messenger user is specifically identified by the nickname or screen name that she or he entered in connecting

to Yahoo! Messenger.

8. Members from the Federal Child Exploitation Strike Force routinely use an Internet service provider to enter "Yahoo! Clubs" or "Yahoo Instant Messenger" while posing as a minor child. On or about October 18, 2001, a Detective from the Cook County Sheriff's Police Child Exploitation Unit (CEU) was acting in the undercover capacity of a 14 year old female child named "Dena" using the screen name "chdogirl2002." The Detective (also referred herein as "U/C") was utilizing Yahoo! Messenger software on the Unit's undercover computer. The Detective went to a Yahoo! Club named "Older Men and Younger Girl Club," and posted the message, "new to this club 14/f/illinois looking to meet new friends." Approximately one hour later, an individual using the screen name "wemr4664" left a message, "Hi, love to chat with you. email or im me anytime Michael." The Child Exploitation Unit is located in Illinois. All communications, via internet or telephone, sent from or received by undercover officers with the CEU, were sent or received using computers or telephones located in Cook County, Illinois.
9. According to Yahoo! Messenger contact information, the screen name "wemr4664" is associated to Michael Renaud. During chat conversations, Renaud provided the U/C with a telephone number, 770-645-2294, which he stated was his home telephone number. A check with SBC Ameritech indicates that the telephone number is registered to Michael Renaud at 8900 Niblic Drive, Alpharetta, Georgia 30022.
10. In a Yahoo! Messenger chat conversation that occurred on October

24, 2001, Renaud was told that "Dena" was "14 almost 15" and that she was a "freshman."

Renaud stated among other things:

"you need to be real careful about meeting anyone you talk online to. there are some real purvs out here;"

"i'm one of the good guys;"

"ok i shouldn't ask you this but i will anyway ... are you sexually experienced?"

"i talk to a couple girls your age" about "sex;"

"i've never talked to anyone younger than 14."

During this chat, the Detective sent Renaud two computer photo images of Cook County Sheriff's Deputy Janet Staszal, which purport to be photos of "Dena."

11. In another Yahoo! Messenger chat conversation that occurred on November 2, 2002, Renaud sent the Detective five computer generated photos of naked and partially clad teenage girls. As he was sending these images to the U/C, Renaud stated, in part: "the girl may have been 14 at the time ... she just turned 15 ... thats kim when she was 13 or 14."

Renaud then wrote the U/C Detective:

"do you want pics of teens or kids, naked or clothed, alone or doing stuff, boys or girls?"

"what is fun for me might may not be what you like. I like pretty young and older teen nudes and couples."

12. During the November 2, 2002, chat, Renaud also engaged in a sexually explicit conversation with the U/C. Among other things, Renaud

stated:

"i'd gently kiss the outside of your pussy and work my tongue between your lips;"

"It might hurt at first, but then it would feel wonderful;"

"the next time you play with yourself, you can pretend it's me doing it like i wrote to you and maybe it will be more fun."

13. Another Yahoo! Messenger chat conversation occurred on November 5, 2002. In addition to sexually explicit comments, Renaud also said: "i'm bad for playing with someone you age ... how old are you again?" When "Dena" answered, "14 almost 15," Renaud said, "yup i'd be pretty bad if i did that to you."

14. During the next several weeks, several online conversations took place between Renaud and "Dena," during which he sent photo images of clothed and unclothed girls to the U/C, and engaged in sexually explicit conversation.

15. In a Yahoo! Messenger chat conversation that occurred on December 12, 2002, Renaud began utilizing his computer web camera on himself so that the U/C could observe him in real time during the chat conversations. Over time, the sexually explicit conversations continued, and included the following statements from Renaud:

"did u get my Christmas card! ... i mailed you one yesterday ... i want to just rip your clothes off and make love ... i get a hard on and want to be with you ... i love to do oral sex on you" (Dec 24, 2001).

"i think we should make love for you birthday ... that'd be

one present you wouldn't forget" (Jan 8, 2002).

"so do you feel like your 15 now?" (Jan 15, 2002).

16. On January 18, 2002 a parcel addressed to an undercover address maintained by the Child Exploitation Unit, was recovered from the United Parcel Service (UPS) facility in Franklin Park, Illinois. After opening a gift wrapped package inside the box, a Teddy Bear and a birthday card from Renaud, addressed to "Dena," were recovered. The U/C had previously provided Renaud with the undercover address, stating that it was "Dena's" home address.
17. In a Yahoo! Messenger chat conversation that occurred on January 22, 2002, Renaud again began utilizing his computer web camera on himself so that the U/C could observe him in real time during the chat conversations. During this conversation, the U/C observed Renaud take off his shirt. In the chat conversation, Renaud stated, among other things, "so now you can see what my arms around you will look like."
18. Another chat conversation between the U/C and Renaud occurred on January 28, 2002, and again Renaud utilized his web camera to transmit real time images of himself to the U/C. During this conversation the U/C observed Renaud, via the webcam, standing naked and holding his penis in his hand. Among other sexually explicit comments, Renaud stated, "oh i think it will fit very nicely in you if thats what you want to do."
19. On February 27, 2002, Renaud e-mailed photo images to "Dena." These

photos included images of couples engaged in sexual acts.

20. During several chat conversations, Renaud stated that he wanted to make a trip to Chicago to meet with "Dena." He stated:

"i have to see how far in advance i need to buy a ticket to get the cheapest price" (Feb 20, 2002).

"I'll be in Chicago the weekend of 6 - 7 April ... let me know if the weekend is ok for you" (Feb 25, 2002).

"I was even thinking about driving up in my car so i wont have to fly, its only about a 10 hours drive ... i have a 99 BMW ... silver with grey leather interior" (Feb 27, 2002).

"I keep reading in the paper about guys gettin arrested ... for meeting underage girls ... i would hate to open the door at the hotel and have the cops there instead of you ... especially to be busted for something i haven't done" (Mar 10, 2002).

21. On March 11, 2002, Renaud placed a telephone call to an undercover telephone number maintained by the Child Exploitation Unit, a telephone number given to Renaud by the U/C. Deputy Janet Staszal, acting in her undercover capacity as "Dena," had a conversation with Renaud. During this conversation, Renaud stated, in summary, that his trip to Chicago was not to have sex with "Dena." In this same conversation, Renaud also said that he hoped things would work out and they would do the things they had talked about in their chats. Renaud told Deputy Staszal that when she met him at the hotel, she could say she was his niece if anyone asked her any questions.

22. On March 15, 2002, another chat conversation occurred between Renaud and the U/C. In this conversation, Renaud stated:

"I was soooo turned on by talking to you ... i think you know i get totally hard ... what you do to me ... you always turn me on ... i like to know when you get wet."

Renaud also stated, "i have to make sure you understand that I'm not coming to see you for sex," and "i wish i could reach thru this computer and touch you ... i better go now or your gonna make me hot again."

23. On April 3, 2002, Renaud placed a telephone call to the undercover telephone number maintained by the Child Exploitation Unit. Deputy Janet Staszal, acting in her undercover capacity as "Dena," had a conversation with Renaud. In this conversation, Renaud stated, in summary, that he was leaving Georgia to drive to Chicago the next day, April 4, 2002. Renaud stated that he was going to stay at the Holiday Inn, on Frontage Road and gave Deputy Staszal the telephone number. Renaud told Deputy Staszal to call him at the hotel on April 4, 2002, in the evening, so they can make arrangements to meet on Friday, April 5, 2002. Renaud stated that he wanted to make sure that "Dena" was for real, and was not going to stand him up. Renaud stated that he could hardly sleep at night he was so excited. He said he was driving to Chicago just to see her. He also said he was not going to drive 700 miles to meet "Dena," and not see her again. He said they would have a good time, get to know each other, and see each other again. Renaud also said that if they did the things they had talked about during their chats, that would be wonderful, but if they did not, that would be fine too.

24. The telephone number given by Renaud to Deputy Staszal is associated to the Holiday Inn, 4400 Frontage Road, Hillside, Illinois.
25. On April 3, 2002, during a Yahoo! Messenger chat conversation, Renaud stated, in reference to his trip to Chicago, that "i almost hope the weather is terrible so we'll stay inside." In this conversation, Renaud described sexual acts with "Dena," and stated that he would "put my hand flat on your belly and caress that then slip it inside your pants." Also in this conversation, Renaud stated that "i guess i just needed to be sure first after we talked today, i know that this is for real and not just some game."
26. In the April 3, 2002, chat, Renaud stated, "there has been so much stuff in the news lately about people getting in trouble, i didnt want you to think that the reason that i was coming was to have sex with you. i wanted you to know that if we just walked around and talked and got to know each other, that would be great with me and i'd still have an awesome weekend."
27. On April 4, 2002, a surveillance agent observed a silver BMW with Georgia license plates marked "WEMR" in the parking lot to the Holiday Inn, Hillside, Illinois.
28. On April 4, 2002, Deputy Janet Staszal, acting in her undercover capacity as "Dena," called Renaud at the Holiday Inn, Hillside, Illinois. During this conversation, in summary, Renaud asked Deputy Staszal if she wanted to meet that night, instead of on April 5, 2002, as previously planned. Deputy Staszal said she could not meet

that night, but she would meet with Renaud on April 5, 2002, at 12:30 p.m.

29. On April 5, 2002 at approximately 12:10 p.m., Deputy Janet Staszal, acting in her undercover capacity as "Dena," telephoned Renaud. In this conversation, Renaud said, in summary, that he would meet her at a McDonald's restaurant at 12:45 p.m.
30. At approximately 12:45 p.m., Deputy Staszal was seated at a table at a McDonald's restaurant located in Forest Park, Illinois. Renaud entered the restaurant and approached Deputy Staszal. Renaud greeted Deputy Staszal and asked for a hug. Deputy Staszal hugged Renaud and Renaud then suggested they get some lunch. As the two began walking away from the table, an officer with the CEU approached Renaud and placed him under arrest.
31. The CEU officer advised Renaud of his Miranda rights, which Renaud waived.
32. Renaud consented to a search of his hotel room. Agents recovered, among other items, two tickets to a Chicago Cubs game, a baseball glove, a web camera, a cable used to connect a web camera to a computer, a digital camera and a 35mm disposable camera. Agents also recovered condoms from Renaud's toiletries bag.
33. Renaud waived his Miranda rights in writing and consented to an interview. In summary, Renaud admitted that he was "wemr4664" and that he had sexually explicit conversations with "Dena." Renaud

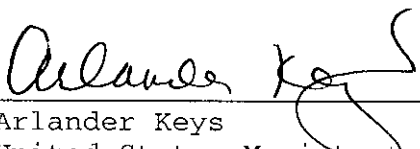
admitted that he sent sexually explicit images to "Dena." Renaud admitted that he posed naked, via web camera, during his computer chat with "Dena."

34. Based on the evidence described in this affidavit and my experience and training, I believe that probable cause exists to believe that beginning on or about October 18, 2001, and continuing to on or about April 5, 2002, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere, Michael Renaud, used, and caused the use of, a facility and means of interstate and foreign commerce, including telephone calls and wire communications comprised of Internet "real time chat" transmissions and e-mail transmissions, knowingly to attempt to persuade, induce, and entice a female minor who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Sections 2422(b) and 2.

Further affiant sayeth not.


ROBERT A. WILLIAMS
UNITED STATES POSTAL INSPECTOR

Subscribed and sworn to before
me this 5th day of April, 2002.


Arlander Keys
United States Magistrate Judge